

# HERMAN & WHITEAKER, LLC

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## VIA ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, D.C. 20554

**Re: Notice of Ex Parte; Modernizing the E-Rate Program for Schools and Libraries,**  
RM-11841, WC Docket No. 13-184, CC Docket No. 02-6.

Dear Ms. Dortch:

On Wednesday, August 21, 2019, Steven Metts, General Manager of Valley Telephone Cooperative (“Valley”), and his counsel, Clare L. Andonov and the undersigned with Herman & Whiteaker, LLC, met with Bryan Boyle, Gabby Gross, Stephanie Minnock, Hayley Steffen and D’wana Terry of the Wireline Competition Bureau of the Federal Communications Commission’s (the “Commission”). During the meeting, Mr. Metts discussed the potential waste in the Schools and Libraries (“E-Rate”) Program created in the services project awarded for funding year 2019 in the Cochise County Educational Technology Consortium (the “Consortium”) in Arizona. The parties in general discussed the Petition for Rulemaking in the above captioned proceeding and urged the Commission to release a Notice of Proposed Rulemaking to address the overbuild and waste concerns described in the Petition.

Pursuant to Section 1.1206(b) of the Commission's Rules, we are filing this letter electronically in the above-captioned docket. Please contact the undersigned if you have any questions.

Respectfully submitted,



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Donald L. Herman, Jr.

Clare L. Andonov

*Counsel to Valley Telephone Cooperative*

Cc: Bryan Boyle (via email)  
Gabby Gross (via email)  
Stephanie Minnock (via email)  
Hayley Steffen (via email)  
D'wana Terry (via email)

